

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF IOWA

In re:)	Case No.: 16-01823-als11
)	Affiliated Case Nos: 16-01825 & 16-01827
FANSTEEL, INC.)	
)	Chapter 11
Debtor and Debtor in Possession.)	
)	Hon. Anita L. Shodeen
1746 Commerce Rd.)	
Creston, IA 50801)	<u>FIRST DAY MOTION</u>
)	
EIN: 36-1058780)	EX PARTE MOTION FOR JOINT
)	ADMINISTRATION OF ESTATES
)	
)	No Hearing Set
_____)	

COMES NOW Fansteel, Inc., the Debtor and Debtor in Possession herein, by and through its proposed General Reorganization Counsel, Jeffrey D. Goetz, Esq., of the law firm of Bradshaw, Fowler, Proctor & Fairgrave, P.C., and hereby respectfully files the instant *Ex Parte* Motion for Joint Administration of Chapter 11 Estates. This Motion is based, in part, on the Declaration of Jim Mahoney, Chief Executive Officer of Fansteel, in support of First-Day Motions and Applications filed contemporaneously herewith. In support of this Motion, Debtor would show the Court as follows:

1. On September 13, 2016, Fansteel, Inc. ("Fansteel"), a Delaware corporation duly authorized to do business in the State of Iowa, filed its voluntary petition under Chapter 11 of the Bankruptcy Code, which case is now pending before this Court as Case No.16-01823, and in which the Debtor is duly operating as a Debtor in Possession, pursuant to Bankruptcy Code Sections 1107 and 1108.

2. On September 13, 2016, Wellman Dynamics Corporation (“Wellman”), a wholly-owned subsidiary of Fansteel, a Delaware corporation duly authorized to do business in the State of Iowa, filed its voluntary petition under Chapter 11 of the Bankruptcy Code, which case is now pending before this Court as Case No. 16-01825, and in which the Debtor is duly operating as a Debtor in Possession, pursuant to Bankruptcy Code Sections 1107 and 1108.

3. On September 13, 2016, Wellman Dynamics Machinery & Assembly Inc. (“WDMA”), a wholly-owned subsidiary of Fansteel, a Delaware corporation duly authorized to do business in the State of Pennsylvania, filed its voluntary petition under Chapter 11 of the Bankruptcy Code, which case is now pending before this Court as Case No. 16-16-01827, and in which the Debtor is duly operating as a Debtor in Possession, pursuant to Bankruptcy Code Sections 1107 and 1108.

4. The above-stated Chapter 11 cases are substantially related in that Fansteel wholly-owns each of the two other corporate entities, and therefore there is a common ownership between Fansteel, Wellman, and WDMA.

5. Collectively, Fansteel, Wellman, and WDMA, all involve property used in the manufacturing of aluminum and magnesium castings for aerospace and defense industries, and immediately prior to the Petition Date in Fansteel, and subsequently through the Petition Dates of Wellman and WDMA, operated their respective businesses under one unified business operation.

WHEREFORE, Jim Mahoney, in his capacity as CEO of Fansteel, which is the owner of Wellman and WDMA, respectfully requests that this Court enter an Order for Joint Administration of all three Chapter 11 Cases identified herein, and that the Court designate Fansteel, Case No. 16-

01823, as the Lead Case, and for such other and further relief as may be just and equitable under the circumstances.

Dated: September 13, 2016

/s/ Jeffrey D. Goetz
Jeffrey D. Goetz, Esq., IS# 9999366
Bradshaw, Fowler, Proctor & Fairgrave, P.C.
801 Grand Avenue, Suite 3700
Des Moines, IA 50309-8004
515/246-5817
515/246-5808 FAX
goetz.jeffrey@bradshawlaw.com

Proposed General Reorganization Counsel for
Fansteel, Inc.; Wellman Dynamics Corporation; and
Wellman Dynamics Machinery & Assembly, Inc.,
Chapter 11 Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

This document was served electronically on parties who receive electronic notice through CM/ECF as listed on CM/ECF's notice of electronic filing.

/s/ Barbara Warner